

To: Rao, Kate[Rao.kate@epa.gov]
From: Dermer, Michele
Sent: Mon 7/14/2014 8:27:36 PM
Subject: RE: STRONGER questionnaire document in the District 2 response

We did a few exemptions post primacy. I have those records.

From: Rao, Kate
Sent: Monday, July 14, 2014 1:12 PM
To: Dermer, Michele
Subject: FW: STRONGER questionnaire document in the District 2 response

Michele – In 2002, EPA funded state reviews of Class II programs. See Page 111. E. Objective: Understand The Process for Aquifer Exemptions. At the time the report was written, it states that post primacy approval, two aquifer exemptions have been approved and submitted to EPA. The first was 'missed' during the primacy app and has been added to exempt list. The second is pending EPA approval. The names of these aquifers are not mentioned. The title of the report states 'Follow-up and Supplemental Review'. I'll see if I can find the original review and send it to you.

Kate

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From: Kate Rao [<mailto:Rao.Kate@epamail.epa.gov>]
Sent: Monday, July 14, 2014 1:03 PM
To: Rao, Kate
Subject: Fw: STRONGER questionnaire document in the District 2 response

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----- Forwarded by Kate Rao/R9/USEPA/US on 07/14/2014 01:02 PM -----

From: Kate Rao/R9/USEPA/US
To: "JAMES D WALKER" <jameswalker5@msn.com>,
Cc: George Robin/R9/USEPA/US@EPA, "Mark Nelson" <mnelson@horsleywitten.com>
Date: 07/29/2010 03:46 PM
Subject: Re: STRONGER questionnaire document in the District 2 response

Jim - George also found an amendment/follow-up to the 2000 STRONGER Report (see attached).

(See attached file: California Follow-up Review 12-2002.pdf)

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▼ "JAMES D WALKER" ---07/27/2010 12:52:25 PM---Hi Kate, The District 2 response to the questionnaire includes the 2000 STRONGER questionnaire with

"JAMES D WALKER" <jameswalker5@msn.com>

From:

Kate Rao/R9/USEPA/US@EPA

To:

Cc: George Robin/R9/USEPA/US@EPA, "Mark Nelson" <mnelson@horsleywitten.com>, David Albright/R9/USEPA/US@EPA

07/27/2010 12:52 PM

Date:

STRONGER questionnaire document in the District 2 response

Subject:

Hi Kate,

The District 2 response to the questionnaire includes the 2000 STRONGER questionnaire with the CDOGGR responses that we discussed in our call this morning. It is a pdf document that couldn't be edited and didn't allow me to insert comments. I requested their responses in a WORD document, which they promptly provided and I used for inserting my comments. The WORD document doesn't include the STRONGER document, however, which is the version I sent to you for review. I have attached the pdf version of the questionnaire, which you may not have seen until now.

District 2 refers to the STRONGER document in many of their responses to our questionnaire. It is nearly

identical to our questionnaire except that is much longer and more comprehensive than our questionnaire. None of the other districts referred to the STRONGER questionnaire. It appears that it was answered by the CDOGGR HQ office in 2000, rather than at the district level, and from a HQ perspective. The District 2 response updated the year 2000 responses where appropriate, but referred to the STRONGER document responses where the response to specific question hadn't changed. The other Districts apparently weren't aware of the existence of the STRONGER questionnaire, or they might have referred to it in their responses to our questionnaire. It addresses many of our questions, at least at the HQ level of UIC program implementation, but not necessarily at the district level in some areas.

I may be able to eliminate a considerable number of my comments in all of the District responses if we accept the responses in the STRONGER questionnaire as supplemental to the District responses. In few instances, the responses are contradictory, however, and need further clarification. Also, the District offices operate semi-autonomously and their responses reflect that in some areas. The areas that reflect a commonality of operating procedures in all districts include MIT, P&A, and financial assurance requirements. Implementation of those procedures is not necessarily identical between the Districts, however, which is probably due primarily to lack of adequate resources in the largest Districts.

I hope this adds clarity to the context of my responses, particularly in the District 2 questionnaire response. If you have any suggestions or questions, please let me know.

Thanks,

Jim

[attachment "DOGGR UIC Class II review questionnaire District 2, Ventura.pdf" deleted by Kate Rao/R9/USEPA/US]